

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

FRONTIER AIRLINES, INC.,

Plaintiff,

v.

AMCK AVIATION HOLDINGS IRELAND  
LIMITED, ACCIPITER INVESTMENT 4  
LIMITED, VERMILLION AVIATION (TWO)  
LIMITED, ACCIPITER HOLDINGS DAC,  
CARLYLE AVIATION MANAGEMENT  
LIMITED, MAVERICK AVIATION  
HOLDINGS LIMITED, MANCHESTER  
AVIATION FINANCE S.A.R.L., VERMILLION  
AVIATION HOLDINGS LIMITED, WELLS  
FARGO TRUST COMPANY, N.A., solely in its  
capacity as OWNER TRUSTEE, and UMB  
BANK, N.A., solely in its capacity as OWNER  
TRUSTEE,

Defendants.

Case No.: 1:22-cv-02943 (PAE)

**DECLARATION OF JED M. SCHWARTZ IN SUPPORT OF DEFENDANTS' MOTION  
TO ALTER OR AMEND THE COURT'S JULY 18, 2023 ORDER GRANTING  
PLAINTIFF'S APPLICATION TO CONVERT TEMPORARY  
RESTRAINING ORDER TO PRELIMINARY INJUNCTION**

I, Jed. M. Schwartz, hereby declare as follows:

1. I am a member of the law firm Milbank LLP, counsel to Defendants Wells Fargo Trust Company, N.A., solely in its capacity as Owner Trustee ("Wells Fargo"), and UMB Bank, N.A., solely in its capacity as Owner Trustee ("UMB"), in the above-captioned action. I am a member in good standing of the bar of the State of New York and of this Court.
2. Attached hereto as **Exhibit 1** is a true and correct copy of the transcript of the Court's July 18, 2023 hearing on Frontier's application to convert the temporary restraining order to a preliminary injunction.

3. Attached hereto as **Exhibit 2** is a true and correct copy of the unexecuted guaranty that Defendants provided to Frontier on August 1, 2023.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York  
August 2, 2023

/s/ Jed M. Schwartz  
Jed M. Schwartz